

July 21, 1982

CD82-4(LD)

Dear Light-Duty Manufacturer:

Subject: Questions and Answers on Optional Light-Duty Application Format

REF: Optional Light-Duty Application Format, 1983 and Later Model Years,  
April 27, 1982 CD82-2(LD)

EPA has received several questions concerning the Optional Light-Duty Application Format. A number of these questions may be of general interest and are answered below:

- Q.1 Has the definition for engine code been changed? Is EPA considering an amendment to the engine code definition to cover the case where calibration serves as a major engine code discriminator?
- A. No change has been or will be made to the engine code definition. An engine code continues to be a unique combination of emission related items (including calibrations) within an engine family-emission control system combination. Formerly, an extensive list was used to define emission related components. This list was cumbersome and overly restrictive for some manufacturers. Under the new optional format, each manufacturer is responsible for determining which components may affect emissions and for declaring a new engine code when appropriate. This approach is not intended to alter the concept of a unique engine code.
- Q.2 Under the new format, manufacturers are no longer required to routinely submit calibration information. Therefore, are running change submissions concerning calibration changes necessary?
- A. Yes. Manufacturers must still inform EPA of all running changes, including a brief description of the change. Normally, a calibration change would create a new engine code with at least one new part

number. This would have to be reported. EPA then reviews the running change to see that the test data, if any, is adequate. An audit of the running change may be conducted. If the application is not updated, vehicles produced under the running change will not be covered by the certificate.

Q.3 What is the purpose of the request for submitting calibration information within 30 days after the end of model year production? Will calibration information (including flow curves) for the fuel, ignition, and EGR systems be sufficient?

A. The calibration information submitted at the close of the model year is used during EPA's evaluations of in-use vehicles (i.e., recall program). Only information on the fuel, ignition and EGR systems must be routinely supplied for engine families with production of 50,000 or more units. Other information will be requested as needed.

Q.4 Is the specific calibration information which is required to be submitted within 10 days of EPA's request limited to the component parts in the fuel, ignition, and EGR systems?

A. No. The manufacturer must supply calibration information on any specified emission related component within 10 days of EPA's request.

Q.5 Must service literature still be submitted?

A. Yes. Shop manuals and service bulletins are very helpful in answering technical questions. In many cases a particular matter can be resolved by EPA without having to contact the manufacturer.

Q.6 Must projected sales information be submitted to support durability vehicle selection?

A. Not routinely. If questions arise, projected sales information will be requested under an audit. EPA specifically requests that sales information not be routinely submitted. Eliminating unnecessary confidential information from EPA's files will reduce the effort needed to protect such information.

Q.7 Are engineering reports still required to be submitted?

A. Not routinely. They should be filed with the particular vehicle's maintenance log and made available at EPA's request.

Q.8 The optional application format does not specifically mention the

sequencing system. Can we assume that we may complete our application at our convenience before the request for certification?

- A. Yes. However, manufacturers are cautioned that the application must be complete at the time a certificate is requested and that adequate records must be available at the time of an EPA audit.

Q.9 Although the statement is eliminated from this new optional format, is a separate application required to be submitted for each set of applicable emission standards and each class of new motor vehicles?

- A. If so desired, the manufacturer may submit one light-duty application (vehicles and trucks) for all applicable emission standards. In the future, a technical amendment will be made to section 86.082-21 to remove the requirement for separate light-duty applications. It is EPA's intent that the required information be presented in the most efficient and logical manner possible, unnecessary repetition should be avoided. (In the past many manufacturers have referenced common sections to reduce paperwork.) Separate applications, one for heavy-duty gasoline engines and one for heavy-duty diesel engines applications will still be required.

Q.10 What is the difference between the titles, engine code information and engine code applications? Does EPA have a special purpose for separating these two titles?

- A. Engine code information refers to technical data concerning a specific engine code. For example, engine power, tuneup specifications, part numbers, etc. Engine code applications refers to the particular vehicle models in which an engine code may be used. For some manufacturers the two groups could be combined. This would probably be true for an engine family with few codes and with use limited to a few vehicles.

This question may have arisen because the example application was based on a high selling engine family with many engine codes and with applications in a diverse group of vehicles. This is certainly a worst-case, most explanations of engine code application will be much simpler.

Q.11 If a manufacturer elects to use a previous format, may information not required in the new format be deleted? For example, may maintenance logs be deleted?

- A. Yes.

Q12. Can information not required to be routinely submitted be maintained in

a foreign language.

- A. Yes. However, in the event of an audit such information would have to be translated into English.

General questions on the application format may be directed to Richard W. Nash of my staff, he can be reached at (313) 688-4412. Specific certification questions should continue to be directed to your certification team.

Sincerely yours,

Robert E. Maxwell, Director  
Certification Division  
Mobile Source Air Pollution Control